# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC.,	)	
Plaintiff,	)	
v.	)	
CISCO SYSTEMS, INC.,	)	Civil Action No. 04-876-GMS
Defendant.	)	

# PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT CISCO SYSTEMS, INC.'S NOTICE OF DEPOSITION OF VERNON ANTHONY

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to Defendant Cisco Systems, Inc.'s ("Cisco") Notice of Deposition of Vernon Anthony.

### **OBJECTIONS**

- 1. Telcordia objects to the time and location of the deposition. Telcordia will work with Cisco to schedule the deposition at a mutually agreeable time and place.
- 2. Telcordia objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases, such as the pending suits against Lucent and Alcatel (Telcordia Technologies, Inc. v. Lucent Technologies, Inc. Civil Action No. 04-875-GMS and Telcordia Technologies, Inc. v. Alcatel USA, Inc., Civil Action No. 04-874-GMS).
- 3. Telcordia objects to the extent that this deposition in combination with depositions of other witnesses would cause Cisco to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

#### **ASHBY & GEDDES**

/s/ Tiffany Geyer Lydon

Steven J. Balick (I.D. #2114)
John G. Day (I.D. #2403)
Tiffany Geyer Lydon (I.D. #3950)
222 Delaware Avenue, 17th Floor
P.O. Box 1150
Wilmington, Delaware 19899
(302) 654-1888
<a href="mailto:sbalick@ashby-geddes.com">sbalick@ashby-geddes.com</a>
tlydon@ashby-geddes.com

Attorneys for Plaintiff Telcordia Technologies, Inc.

## Of Counsel:

Donald R. Dunner
Don O. Burley
Steven M. Anzalone
Richard H. Smith
Houtan K. Esfahani
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
901 New York Ave., N.W.
Washington, D.C. 20001
(202) 408-4000

Case 1:04-cv-00876-GMS

York M. Faulkner FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER Two Freedom Square 11955 Freedom Drive Reston, VA 20190 (571) 203-2700

Dated: March 24, 2006

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of March, 2006, the attached **PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT CISCO SYSTEMS, INC.'S NOTICE OF DEPOSITION OF VERNON ANTHONY** was served upon the below-named counsel of record at the address and in the manner indicated:

Jack B. Blumenfeld, Esquire Morris, Nichols, Arsht & Tunnell 1201 North Market Street Wilmington, DE 19899-1347 HAND DELIVERY

Matthew D. Powers, Esquire Weil, Gotshal & Manges LLP 201 Redwood Shores Parkway Redwood Shores, CA 94065 VIA ELECTRONIC MAIL

/s/ Tiffany Geyer Lydon
Tiffany Geyer Lydon

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